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Kimberly Lawson Guardian Ad Litem

Rudy -  
This is  
the  
direct  
exam of  
Kimberly  
Lawson  
guardian  
ad litem  
continued

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Q. You can stop there. Fair to say

it's providing additional information?

- A. Correct.
- Q. Is that right?
- A. Yes.

Q. All right. If you look at the third page of this letter, actually it may be - I'm not sure if it's the third page of the letter. Can you tell who the letter was written by or at least who signs it at the end?

A. Yes. At the end of the letter it is page 3 of what I have, bates numbered FD 004318, it says sincerely, and it's signed Lenore Matusiewicz.

Q. Okay. Back to the first page, you see where it says David said?

- A. Yes.
- Q. And if you could just read that part there, David said?

A. David said that you asked him why he should be allowed to keep his parental rights. I have a few reasons. 1 --

Q. Without going through 1 and 2, just read 3?

Hi Rudy & Erin -  
Thank you so much  
for the Bible  
verses on the  
post card - always  
greatly appreciated.  
In my book, you  
can never get  
too much love or  
prayer! God Bless  
you! Onward Christian  
soldiers! Peace, Blessings  
& Love, Amy 😊

# 4934

1 A. 3, Laura, Leigh and Karen are  
2 Christine's weapons to use against David. She  
3 said too numerous times to count that the way to  
4 hurt David is to hurt his children or take them  
5 away from him.

6 Q. Okay. And again, this is, if you  
7 go to the second page, it's a rather -- it's a  
8 single page letter first of all, correct?

9 A. Yes.

10 Q. And it seems to provide a list of  
11 reasons?

12 A. Yes.

13 Q. For their positions; is that  
14 right?

15 A. Yes.

16 Q. And you did request information  
17 from them, correct?

18 A. Yes.

19 Q. Okay. If you go to the second  
20 page at the bottom, you see a number eight, why  
21 should --

22 A. Yes.

23 Q. Uh-huh. And if you could just  
24 read that part?

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2 A. Why should David's parental rights  
not been terminated?

3 Q. Now that's actually an important  
4 question for you, right?

5 A. Yes.

6 Q. That is a key question. So there  
7 are a list of reasons provided under this; is  
8 that right?

9 A. Yes.

10 Q. And they include?

11 A. They include -- want me to read  
12 them?

13 Q. Yeah, you can.

14 A. Because David is not the parent  
15 who abandoned his approximately three month old  
16 baby in a shopping cart in Willie's Market on  
17 Route 13 and when asked where's Karen, he's not  
18 the one who couldn't remember who Karen was.  
19 Please read the letter I wrote to Don Roberts.  
20 And he is not the parent who threw food on a  
21 filthy rug and then commanded his toddler to  
22 pick it up and eat it. Maybe Leigh's autism had  
23 nothing do with the MMR shot. Maybe it was  
24 eating contaminated food. He's not the one who

1 said it's the only way I can get her to eat.

2 And --

3 Q. Continue to the next page.

4 A. And he is not the parent who made  
5 his toddler fight the dog for food. And he is  
6 not the parent who pushed her autistic child  
7 away when Leigh tried to greet her with  
8 outstretched arms and a huge smile. He's not  
9 the one saying that Leigh didn't even know who  
10 she was. (Leigh was

11 confounded/mortified/broken-hearted/broken

12 spirited right after her autism was diagnosed)

13 And he is not the parent who told at least two

14 different stories about how his toddler got a

15 broken collarbone. And he is not the parent

16 that Laura said molested her. Christine may

17 have started molesting Laura as early as three,  
18 2005, but definitely at the age of 5, 2007, when

19 the girls were returned to Christine, Karen was

20 three, almost four. Karen is now five. Am I

21 worried? Try petrified.

22 Q. Now, if you continue on.

23 A. Christine and her attorney seem to  
24 be, with the help of the Attorney General's

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1 office, trying to have David's optometric  
2 license revoked so that he can never practice  
3 the profession he worked so hard to enter and  
4 loved. Then he would not be able to pay the  
5 child support Christine requested slash was  
6 awarded. This does not make any sense to me.  
7 Even the optometrist who allegedly raped his  
8 patients is practicing his profession in  
9 Delaware. I've copied the information on mental  
10 health disorders from Merck's manual because we  
11 are convinced that Christine has a disorder in  
12 addition to post partum depression, ADD in  
13 brackets, ADHD, question mark, and bipolar  
14 disorder that she claims that has not been  
15 diagnosed. David thinks her problems stem from  
16 stopping her medicine. Which one or ones did  
17 she stop. We found Codeine, Paxil, Lexapro,  
18 Wellbutrin and Xanax, not all prescribed at the  
19 same time, but all together in her cabinet, but  
20 I saw signs of multiple personality before she  
21 stopped the drugs, so I've sent all of the  
22 information available to me at this time. We  
23 understand that it's very difficult to diagnose  
24 some personality disorders. Wouldn't \*

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1 information from people who lived with the  
2 patient be helpful to the psych evaluator,  
3 especially if the patient does not recall slash  
4 cannot recall the events. How many things has  
5 Chris forgotten besides her baby, question mark.

6 Q. And then this paragraph.

7 A. Some of Chris's diary may also  
8 shed some light on the subject. Her signatures  
9 are very different at times, as are her  
10 signatures on the applications for PFA's. I  
11 wonder what her signature looks like on her  
12 marriage licenses, driver's licenses, et cetera.  
13 I am going to write to Mr. Hitchings and ask who  
14 he had sign the PFA requests for Chris. She  
15 states in her diary that her friends made up  
16 lies about her. In court she said that David  
17 and I did. Did Laura lie about her too? Is  
18 Christine the only honest person in Delaware/.  
19 But my sister-in-law, M'Linda Kula said I am the  
20 most loving, honest person not capable of saying  
21 anything bad about anyone. See page 67 of the  
22 PFA and she's known me since 1986 or  
23 thereabouts. Who lies?

24 Q. And then we're getting to the end



1 of the letter here?

2 A. As a cathartic exercise I wrote in quotes a Grandmother's Impossible Choice and Amy sent a copy to Doctor Orlov. Dates may be a little off. I've never been good at dates, number memorization or names. It still might give you a better timeline. If you want a copy, please let me know. If we think of anything else, we'll send it. Please, please, please help our girls, all of them, sincerely Lenore Matusiewicz.

11 Q. Okay. There were a number of things attached to this packet?

12 A. Correct.

13 Q. And if you'll just hold that packet up so the jury can get a sense of how thick it was. We're not going to go through all of that.

14 A. And I'm not even sure all of it is in here. I actually think it was thicker than this. There was a tape in here, so there was -- it was thicker than this.

15 Q. All right. Very well. If we could focus on the next page though it appears

My mom ALWAYS considered Christine as one of her girls because she loved her + treated her like a daughter because that is what she was to her.

I think this is referring to the tape from 2006/2007 where the girls were screaming + crying running from chr.'s for a court ordered visit

1 to be a printout of an email?

2 A. Yes.

3 Q. And it's from?

4 A. M-A-I-M at aim dot com.

5 Q. And it says statements, right?

6 The date on it?

7 A. It is Saturday, April 4th, 2009,  
8 at 7:46 p.m.

9 Q. And it refers to a Mr. Medrano; is  
10 that right?

11 A. Yes.

12 Q. Do you recognize that name?

13 A. Yes, he was an attorney in the  
14 criminal cases. I believe it was for David.

15 Q. All right. And it reads, if you  
16 could just read the first line there?

17 A. These are the things that my  
18 oldest niece Laura had said to Juan and myself.

19 Q. Do you recognize the name Juan?

20 A. I believe that is Amy Gonzalez's  
21 husband.

22 Q. Okay. And if you can read what it  
23 says under Juan?

24 A. In the playroom section at Dave's \*

1 office, I was checking my daughter's diaper to  
2 see if she needed to be changed and Laura  
3 started to get very upset and Laura asked why I  
4 was touching her, why I put my hands in her  
5 diaper and told me that I shouldn't be doing  
6 that. She became very protective of Tatiana.  
7 On another occasion I was playing with both  
8 Laura and Tatiana and I knew at this time Chris  
9 was only taking Laura for visits, so I asked how  
10 her mother was doing and Laura said that her  
11 mother was doing good. I asked if she missed  
12 her mother and Laura said not really. Later in  
13 that conversation Laura told me that she had a  
14 secret that her mom promised her that she could  
15 not tell anyone because it would get her mom in  
16 a lot of trouble. Laura said that she had to  
17 keep the secret because it would get her mom in  
18 trouble. Laura said that she doesn't want to do  
19 it but it makes her mommy feel good and it makes  
20 her mommy feel happy. I tried to convince her  
21 that she could tell me that I could help her,  
22 but she said that if she told me that it would  
23 not be a secret anymore and that her mom would  
24 get in trouble. I told her that her grandmom is

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good listener and good person and she would listen to what she has to say.

Q. Okay. And under Amy?

A. Every time I sent my niece Laura for a visit with her mother she would put on extra clothing, extra panties, extra shirts, even in the summertime. I couldn't figure out why she was doing this at first, but it made me pay extra attention because I found that awkward. I was at my brother's house watching my nieces one day while my brother and mother had to go to court with my sister-in-law and my niece Laura and I had time to talk, while my other two nieces and my daughter had fallen asleep. I asked her how her mother was doing. I was surprised when Laura started to tell me that her mother lies. I told her that she was still her mother and that she had to love her. Laura also said that Chirs made Laura do things that would get her mother into a lot of trouble and that they were a secret that she couldn't tell anybody because her mom would get into a lot of trouble. She didn't want her mom to go to jail. I told her that she could tell me

This is the statement the government used against me because I was distracted by my husband + 4 yr old daughter while writing the email and forgot to include the incident regarding the G spot in the bathtub.



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whatever she needed to say and that I would not tell anyone her secret. I told her that she could talk to me about anything, that I was always going to be there to protect her from anyone that was hurting her.

Q. Okay. Now beyond the letter that was something beyond this email there was something else referenced in the cover letter you read about?

A. The Merck manual.

Q. Yes. And there was an attachment to the letter that included photocopied pages from what appear to be a book; is that right?

A. Correct.

Q. And we're just looking at the first page of that; is that right?

A. Yes.

Q. And it reads mental health disorders?

A. Yes.

Q. And then it lists the various disorders?

A. Yes.

Q. We can set that aside, but that

ot

1 goes for a number of pages there I think in the  
2 document.

A. A lot of pages, yes.

3 Q. I'm going to try to direct your  
4 attention to the page that's bearing Bates label  
FD-3614?

THE COURT: Mr. McAndrew, how much  
longer do you have on direct? It's close to the  
time for our afternoon break.

Members of the jury, are you ready  
for a break now? All right. Then we'll take  
our afternoon recess now.

All rise in respect to the jury.

All right, counsel. We'll stand  
adjourned until the jury is ready.

(Side-bar discussion:)

MS. CHAVAR: Just, you know,  
another sort of accidental slip, PFA was  
discussed. PFA is out. So now the jury is left  
there wondering what's this PFA? When did this  
PFA happen? So maybe we can just get kind of  
some kind of instruction.

MR. McANDREW: Post kidnapping  
PFA.

Just to clarify - chris  
signed the false PFA  
against David in 2006  
prior to her running  
with the kids.  
she also signed a PFA  
against David + mom  
in 2009 or 2010 after  
the kidnapping while  
mom + David were in  
prison -> Regarding the kidnapping  
she was very familiar  
with PFA's + the court  
system. SO why no  
PFA or harassment  
charges for our stalkng.

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1 MR. McCALL: They testified to it  
2 yesterday.

3 MS. CHAVAR: I don't recall that.  
4 And I know yesterday when it came up, we came to  
5 side-bar.

6 MR. McANDREW: I didn't realize  
7 there was an issue with the post kidnapping PFA.

8 MS. CHAVAR: I don't know that it  
9 was a post kidnapping PFA. What was discussed  
10 today when it was read by Ms. Lawson, to me  
11 because I know the case because it's very clear,  
12 she was referring to the cross PFAs in January,  
13 ~~2006~~ 2006 which were precluded in the motion staging,  
14 so now the jury is just out there wondering what  
15 is this PFA, when did this happen. Maybe we  
16 could be careful about the PFA and do some  
17 limiting instruction like maybe tell the jury  
something.

While mom  
& David  
were in  
prison for  
the kidnapping  
she filed  
a PFA against  
them both.

MR. McANDREW: We can tell them  
after the kidnapping, there were PFAs put in  
place regarding David and Lenore, and you know,  
if you want to explain that.

23 THE COURT: Here is what I would  
24 like to do. I would like to say members of the

# 4946

1 jury, you're hearing a wide array of testimony  
2 over a series of events that span many years.  
3 When you go to deliberate in the case, I'm going  
4 to be having you focus specifically on a certain  
5 time period and on certain specific criminal  
6 charges. Keep in mind that as we were  
7 proceeding, there is a great deal you're hearing  
8 that I'm going to later tell you is not really  
9 the focus of the verdict in this case, but  
10 rather is part of the background and you're  
11 going to be asked to look at a specific time  
12 frame and specific conduct. How does that work  
13 for the defense?

14 MR. McANDREW: For the defense.

15 MR. BOSTIC: Your Honor, I  
16 appreciate that instruction very much. The  
17 question I have is there are documents that are  
18 admitted and if Attorney Lawson was referring to  
19 the 2006 PFA, it would need to be redacted.

20 THE COURT: Right. Let me tell  
21 you my approach to exhibits. While I think  
22 generally the rules of evidence are abused and  
23 judges limit the jury's access to evidence, in a  
24 case like this, we're looking at so many

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1 documents, before anything goes out we all look  
2 at it closely to make certain there is nothing.  
3 Vis-à-vis when I said I'm not going to hold  
4 Mr. Bostic up over you didn't say explicitly  
5 this is for a limited purpose, we're going to  
6 realize there is so much documentation, by  
7 definition some documents are not in there  
8 entirety proper for the jury to see and I will  
9 exercise on my part discretion, you on your part  
10 will exercise professionalism to get that right.

11 Should I give that instruction now  
12 or should I give it -- I mean about the limiting  
13 or the this or the that?

14 MR. McANDREW: Here is the issue  
15 on it, we have these packets of information, and  
16 I'll tell everybody this is the last big packet,  
17 she received many packets, we pared this down.  
18 A lot of this information refers to the whole  
19 history because for these folks there wasn't  
20 this dividing line between the post charge and  
21 the precharge.

22 THE COURT: There is an inherent  
23 problem in the case by virtue of the span of the  
24 years and the nature of the relationship, so we

1

have had to grapple with that at multiple intersections. We'll continue to do that. In terms of the construct, it sounds like the defense is okay in terms of the construct. As far as the timing, we can do it at the end of the day.

MR. McANDREW: While we're on this issue, this actually leads into the end of this document, it is this, it's Christine -- excerpts from Christine Belford's diary that Lenore

10

Matusiewicz sends to various people, stolen from Ms. Belford. It's her childhood diary, it's from '86.

THE COURT: I think my ruling was --

MR. McANDREW: It was. I want to understand the ruling.

17

THE COURT: The ruling was that the fact that the diary was sent would be something the jury would be allowed to hear.

18

19

20

21

MR. McANDREW: And they already have.

22

23

THE COURT: But not the content of the diary.

24

The diary was left behind by Chris when she moved out. It wasn't stolen. Her daughter, Katy, even testifies regarding some of their personal items, they left behind when they moved out. ALSO verified by Ms. Lawson

The govt is INACCURATE about their theory of the stolen diary as they are about their stalking theory

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MR. McANDREW: On that issue, Your Honor, we are not sure we understand the why, because this isn't being admitted for its truth or anything of that nature, it's just her childhood writings that they're torturing her with.

MR. McCALL: This is the essence of the harassment. They steal her diary and mail her diary out to people that she knows, that is by definition harassment, I mean, that's her most -- those are her personal thoughts from when she was a girl.

THE COURT: Give me a for instance, Government. Let me tell you what my concern was. Part of my concern is again, since Ms. Belford, this dates back so many years to when she is a teenager, filled with the angst that all of us were as teenagers in the case where the essence of the charge has to do with emotional distress being inflicted on the deceased, I have a real concern again that we not mix apples and oranges too much.

And Mr. McAndrew, it seems to me you can say like many teenage diaries, they deal

no one stole christine's diary. she left it when she moved out.

1 with her own personal -- have her describe it in  
2 a generic sense and just say is that what was  
3 mailed.

4 MR. IBRAHIM: The only objection I  
5 have is that it be limited to who sent it,  
6 because when the Government said the Matusiewicz  
7 family.

8 MR. MCANDREW: You made that  
9 point.

10 MR. IBRAHIM: I'm at the point,  
11 unless there is something, I got to ask a motion  
12 to strike any reference to the testimony as it  
13 relates to Amy.

14 MR. MCANDREW: I have tried to be  
15 careful in saying this was sent by this person.

16 MR. IBRAHIM: I appreciate that.

17 THE COURT: You have also done a  
18 good job, I think, counsel, making your point,  
19 saying, hey, you have done that on cross with  
20 some witnesses. You did it with a proper and  
21 appropriately well-timed objection today so we  
22 could clarify it. But keep your eye on that,  
23 because to the extent that we need a remainder  
24 to the jury, you'll get it.

1 MR. IBRAHIM: After this, that's  
2 what I'm going to be requesting, because it  
3 started off that you received these packages  
4 from the Matusiewicz family.

5 MR. McANDREW: The other issue is  
6 you're going to see Lenore Matusiewicz uses the  
7 diary extensively for her theory that Christine  
8 Belford has multiple personalities. That's  
9 another reason why, because the writing is  
10 different. She says the writing appears  
11 different so, therefore, she must have different  
12 personalities. That's what she says, so I'm not  
13 making that up.

14 MR. BOSTIC: Your Honor, I never  
15 got a chance to respond to --

16 THE COURT: I'm not reversing my  
17 ruling.

18 MR. BOSTIC: Your Honor, I would  
19 ask that, and I think Mr. McCall stated it very  
20 well, the government can argue in closing  
21 exactly what a diary is to a teenage girl.  
22 Getting into it I think opens up a whole lot of  
23 doors that --

24 THE COURT: But what about my

1 proposal, that we just let him ask sort of a  
2 generic question along the lines of unlike the  
3 diary of any teenager, does it contain her own  
4 personal thoughts, many of which as we look back  
5 over time we would now be embarrassed by, we  
6 leave it at that, doesn't that do enough to sort  
7 of just say nobody wants their diary out there  
8 without getting into the microcosm.

9 MR. IBRAHIM: I have no objection  
10 to that if it's also done in a leading fashion.

11 MR. McANDREW: You guys keep  
12 setting me up with this stuff.

13 THE COURT: What I'm trying to do  
14 is make sure that every counsel has the  
15 essential evidence to argue their case without  
16 at the same time polluting the record with  
17 things that are unnecessary.

18 MR. McCALL: Can I make one last  
19 point for the Court. If this was like a revenge  
20 porn case and you had a defendant that was  
21 sending naked pictures of the victim out on the  
22 internet and mailing them to the people in her  
23 neighborhood, her community so on and so forth,  
24 that would be clearly admissible to the defense.

1 This is --

2 THE COURT: It would.

Again -  
the diary  
was not  
stolen

MR. McCALL: Judge, again, the personal diary that they stole from her and they're mailing out, how it looks, the bubbly writing of a teenage girl, that is the essence of the harassment.

9 THE COURT: I applaud the  
10 argument, but I distinguish that case, because  
11 the essence of the prosecution has do with the  
12 emotional distress of the deceased victim, and  
13 anything from a teenager who is recording their  
14 intimate thoughts on paper is by definition  
15 going to cause emotional stress later, I will  
16 take judicial notice, I say that jokingly, I say  
17 the nature of the writing is such that it's  
18 later disclosure based on your life experience.

19 I am prepared to rule, Mr. Bostic,  
20 over your objection that I will let  
21 Mr. McAndrew, you're a very skillful advocate,  
22 you can phrase it in a way that will accomplish  
23 the purpose.

24 MR. McANDREW: I'm sure everyone  
will let me know if I go too far.

1 THE COURT: But to repeat, and  
2 without getting into the details of this, would  
3 it be fair to say that these are her own  
4 personal, sensitive, emotional thoughts during  
5 the teenage years.

6 MR. McANDREW: I'll probably ask  
7 for some dates so we're clear on what time  
8 frame.

9 THE COURT: Yes, when it is, yes.

10 MR. McANDREW: Does the writing  
11 appear different, is this what was sent.

12 THE COURT: Before we go, juror  
13 number seven came back from lunch in tears. A  
14 court officer inquired as to why. Apparently  
15 she's been fired. I would like permission  
16 outside of the hearing of counsel to meet with  
17 juror number seven after court and see what  
18 assistance the Court might be able to --

19 MR. McCALL: I'm sorry. What  
20 happened?

21 THE COURT: Juror number seven,  
22 who would be the African-American woman on the  
23 end who we accommodated with the cushion,  
24 Mr. Vogel, do you recall her name.



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MR. VOGEL: Ramona.

MR. McANDREW: The front row.

THE COURT: Top left.

MR. McANDREW: I don't recall what her employment situation was.

THE COURT: And we don't know whether it has anything to do with her service here, but needless to say, I would like to A, meet with her, offer her support, and I am happy to make whatever inquiry needs to be made about that, but I would like to do that ex parte, and since it's a criminal case, I just wanted to get the consent of all counsel.

MR. BOSTIC: Absolutely, Your Honor.

MR. EDELIN: Yes.

MR. IBRAHIM: Yes.

MR. McCALL: Yes, Your Honor.

THE COURT: I will try to do that as delicately as possible. We'll do it at the end of the day. She's already sat through the first line of testimony. I don't want to embarrass her in the face of other jurors.

MR. IBRAHIM: You're going do it

1 in the back.

2 THE COURT: The choreography, I'm  
3 going to work out.

4 MR. McANDREW: I certainly hope  
5 it's not related to this case, or I think that  
6 employer is going to have an issue.

7 THE COURT: Starting with me.  
8 I'll represent to counsel that when the jury  
9 commissioner here called me about a couple of  
10 lame excuses, I pick up the phone and called the  
11 people writing the letter when it was an  
12 employer.

13 MR. IBRAHIM: That's good.

14 MR. McANDREW: Thank you, Your  
15 Honor.

16 MS. CHAVAR: Thank you.

17 MR. McANDREW: I'm going to go to  
18 the witness stand -- actually I'm going to leave  
19 the document up there so she can see it for the  
20 purposes of describing, before it goes back  
21 we'll remove that portion of the document.

22 THE COURT: Good enough, counsel.

23 MR. BOSTIC: Your Honor, I have a  
24 suggestion. Maybe Mr. Andrew would like to

1 speak with the witness. We would have no  
2 objection to that to layout where he's going  
3 with that.

4 THE COURT: Take a minute.

5 MR. McANDREW: Sure.

6 THE COURT: Why don't we arrange  
7 ourselves.

8 MR. McANDREW: All right.

9 MR. BOSTIC: Thank you, Your  
10 Honor.

11 (End of side-bar discussion.)

12 THE COURT: All right. We're  
13 coming down the home stretch this afternoon and  
14 once again, members of the jury, during the  
15 break we addressed evidentiary issue, so we're  
16 making even use of your break time. Please,  
17 make yourself comfortable.

18 MR. McANDREW: Ready to proceed,  
19 Your Honor?

20 THE COURT: By all means.

21 MR. McANDREW: Thank you.

22 BY MR. McANDREW:

23 Q. Ms. Lawson, we're back. When we  
24 left off, we were in the middle of Exhibit

1 Number 507. Do you still have that in front of  
2 you?

3 A. Yes.

4 Q. We were talking about a page  
5 entitled Mental Disorders?

6 A. Yeah.

7 Q. We're now going to move on to the  
8 page that's Bate's stamped at the bottom  
9 FD-3614.

10 A. Okay.

11 Q. Do you have that in front of you?

12 A. Yes, I do.

13 Q. And this appears to be a  
14 handwritten letter?

15 A. Yes.

16 Q. And it's addressed to?

17 A. It is addressed to Dr. Marsha  
18 Orlov.

19 Q. And if you'll flip, if you'll look  
20 at the very top there, bear with me for one  
21 moment, it says in handwriting, where it's from?

22 A. 660 Baylor Boulevard, New Castle,  
23 Delaware 19720, August 26, 2010, written front  
24 and back, total twenty-one pages.

1 Q. You said it was to Dr. Orlov?

2 A. Correct.

3 Q. Before we begin looking at the  
4 letter, if you will flip through it to the last  
5 page and see if it bears a name. And I believe  
6 that's FD-3635?

7 A. Correct.

8 Q. And is there a name on the end of  
9 it?

10 A. It says sincerely and it's signed  
11 Lenore Matusiewicz, and then below that is  
12 printed Lenore Matusiewicz.

13 Q. If we could go back to the first  
14 page of the letter, 3614.

15 A. Yes.

16 Q. I presume we are not going to read  
17 twenty-one pages, but we want to look at some of  
18 it. To begin with, we'll just do the opening  
19 paragraph. Sorry. If you could just read the  
20 opening paragraph so we understand what the  
21 letter is about?

22 A. Dear Dr. Orlov, it was suggested  
23 to me that I write to you in case you continue  
24 to have problems getting in to see me. Since my

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falls in 2009 in Baylor, I found some difficulty organizing things and vocabulary has been giving me some trouble. Doctors at Christiana Hospital said they think I have PTSD for want of a better diagnosis. I am not sure what is significant, but here it goes, and there is three dots.

Q. And Dr. Orlov you said was whom?

A. She was a psychologist that was hired by David Matusiewicz in the PTR proceeding.

Q. Did she end up testifying in that proceeding?

A. She did testify in that proceeding.

Q. This was a letter to her and it's been sent to you as part of the packet that came from whom?

A. It was sent to me twice.

Q. In this packet?

A. In this packet it was sent to me by Lenore Matusiewicz.

Q. And it was sent to you another time?

A. Yes. By I think her name was

1 starts with a J Kula.

2 Q. Okay. Back to the letter, if we  
3 can go to the first paragraph, and I promise we  
4 will not read all of this, but there are some  
5 portions of it that are important that I want to  
6 direct your attention to. You can begin with  
7 number one?

8 A. Number one, when Dave and Chris  
9 married each other they made her my child. I  
10 believe (like Agatha Christy) that a mother's  
11 love is unconditional and Chris is my child.  
Although Chris divorced David, she didn't  
divorce me. My husband said to me after my  
return to the US from Nicaragua that if I were  
taking my last breath and Chris asked for it,  
I'd give it to her. He can't seem to understand  
it. The motivation and my reasoning behind.

*Mom  
loved  
Christine  
as she  
loved me  
because  
we were  
her daughters.*

17  
18 Q. All right. It says my attitude  
19 the next line; right?

20 A. I have to find where I was. Yes,  
21 my attitude.

22 Q. You can stop there.

23 If we go to the next page. You  
24 see number two?

1  
2  
3 A. Yes.

4 Q. I will highlight number two and  
5 ask you to read that.

6 A. I thought you'd said they didn't  
7 find any evidence of multiple personality  
8 syndrome/schizophrenia in Chris. I am not a  
9 diagnostician, but lived with her, her children,  
10 Dave and my husband from October 2003 until  
11 August 2004. In her diary, she not only wrote  
12 that she needed something new in her life all  
13 the time to keep it interesting or she'd get  
14 depressed, but that her friends told lies about  
15 her. What lies was she referring to? Why did  
16 Dana Renee, (spelling?) say Chris intimidated  
17 everyone in their class? Why did Chris seem  
18 surprised at that statement? Chris seemed to be  
19 very angry with a young man named Bill Robinson  
20 around the end of 1991. What did she do to  
21 him/plan on doing to him, if anything? Is he  
22 one of the people who told lies about her?

23 Q. And I'll just resize here.

24 A. There's a gap in her diary in  
1991. Why didn't she write for such a long  
time? Was she very busy like I was from 2005



1 through 2007? Did Chris ever present her  
2 diaries to the psychologist(s)/psychiatrist(s)  
3 she saw? Would they have been helpful in  
4 getting her problems solved and questions  
5 answered?

6 Q. And then the last paragraph?

7 A. In court with Judge Brady - during  
8 my hearing on September 10, 2009, Chris said  
9 that David and I made up terrible lies about  
10 her. She knew we told Ami Farrall that Laura  
11 accused her mommy of molestation. Laura's hymen  
12 (as I've said) was torn but looked healed (not  
13 newly opened) when I saw it in 2007. Did Laura  
14 lie at five years of age? In my experience  
15 preschoolers tell it all. Who was --

16 Q. You can finish. The paragraph  
17 carries over to the next page, you can just  
18 finish the top of that page.

19 A. Who was Laura referring to when  
20 she said that mommy taught us all about the G  
21 spot when we were in the bathtub. Laura and  
22 Katie? Laura, Leigh and Karen? All four girls?  
23 How do you teach children about the G spot and  
24 why?

1 Q. If you flip to the next page,  
2 that's 3617, do you have that?

3 A. Yes.

4 Q. You see a paragraph that begins  
5 when Chris said?

6 A. Yes.

7 Q. All right. And if you'll just  
8 read that, I'm not going to put it up on the  
9 screen.

10 A. When Chris said in quotes if  
11 Dave's children are injured or should become  
12 seriously ill, as their mother of course I'll be  
13 sad, but David will be devastated. I was  
14 reminded of an interview with a woman who killed  
15 several of her children. That woman said she  
16 felt sad when she knew her children had to die.  
17 I remember goose bumps and a chill running up my  
18 spine to my head. At times when Chris said  
19 things I thought were strange, her appearance,  
20 facial expression, focus of her gaze went blank  
21 all of a sudden and then returned to normal,  
22 whatever had been before the statement.

23 When she repeatedly said all you  
24 have to do to hurt David is hurt his children or

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I know how to hurt Dave, just hurt his kids or similar words, she would be smiling as if joking. Other times she appeared deadly serious. Why did she want to hurt Dave?

Q. If you'll just stop there. I'm going to ask you to skip the next six pages of the document and go to 3623.

A. Okay.

Q. Do you have 3623?

A. Yes.

Q. And if you'll look at paragraph, the paragraph in the middle here, I think six?

A. You asked what is the plan now.

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haven't really discussed anything other than than my going to Texas and getting Laura, Leigh and Karen to safety (back). Tom wants to sell our house to be able to continue paying lawyers, doctors, et cetera. So we might returning to Nicaragua (I own the land there if they haven't confiscated it yet) or Panama or something. My question is, when does molestation stop? In my case not until I, his victim, was out of Uncle Arthur's reach (this is one of the reasons I left) Laura looks as if she's gained 50 pounds?

My mother who was molested by her uncle didn't disclose the abuse until she was in her 30's... many years after it happened. This is not uncommon

1 So she'd be unattractive to her predator? Why  
2 did Chris get Paxil after the girls returned?  
3 Didn't she need it when she was so depressed  
4 that they were gone? I want her to get the  
5 right diagnoses and a treatment plan which would  
6 leave her happy, healthy and untroubled,  
7 satisfied, if that's what she wants. I want  
8 David out of prison. I'd like to see both sides  
9 reunited (probably not remarried) but in a  
10 relationship that is truly mutually beneficial  
11 as well as good for all the children involved.

\*  
\*  
\*

This was  
our wishes  
for  
Christine  
not  
her  
death.

12 Q. I'm going to ask you to skip the  
13 next six pages and go to 3629. Begins at the  
14 top, she turns to Laura?

15 A. She turns to Laura as if --

16 Q. Stop for one second I'm sorry. If  
17 we go back one page before that, I'm sorry, I  
18 have the wrong page, begins at the bottom?

19 A. When?

20 Q. When.

21 A. Yes. When we went to Nicaragua  
22 Laura started having a nightmare several times a  
23 week. In the nightmare mommy's in a big hotel  
24 and she turns to Laura as if on camera and says,

1 quote, I'm coming for you, Laura, and this time  
2 you'll have to come with me, end quote. Laura  
3 would wake up sobbing and shaking and come back  
4 to where I was sleeping. She's climbed into my  
5 lap and tell me the dream and I'd tell her she  
6 was safe, she was with grandma and and daddy and  
7 we were all okay. Finally someone, possibly  
8 David, possibly Ciolo Elion told her that mommy  
9 had died and couldn't come to get her. When  
10 Laura told me that mommy had died I asked her if  
11 she knew what it means to be dead. When she  
12 said no, I said that when someone is dead you  
13 probably wouldn't see them anymore. She said  
14 oh, and went back to play. She only brought it  
15 up. Mommy had to die. She was fun on play with  
16 sometimes. She never had the nightmare again  
17 until 3-13-09 when mommy came for her and she  
18 had to go with her. How did Laura know?

19 Q. And you can continue reading.

20 A. Number 13, 03-13-09, I couldn't  
21 tell Laura that mommy was coming for them. My  
22 last words to the girls were something like  
23 grandma has to go somewhere, be good, watch out  
24 for Leigh and Karen, make sure they watch out

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for you and I'll come back as soon as I can. I  
wasn't allowed to hug or kiss them goodbye or  
get anywhere near them. I was taken to the  
airport, waited for two to three hours for my  
plane, flew to Florida and went directly to  
prison. I had told the US Marshals in Nicaragua  
that Christine had threatened to sell the girls.  
I think they told her. Does she think that was  
a lie? Where was she when she made the threat?  
Who was she when she made the threat in the  
kitchen on Norva Drive. Who, which Chris,  
picked up the girls. Is there a new one?

Q. Go to 16 at the bottom of that  
page.

A. Okay. Number 16, prison life  
surprised me. It's like living in a big dorm in  
college. I wrote to my Aunt Flo and told her  
that if this is prison I could do this standing  
on my head, if I could stand on my head. No  
cooking, no laundry, no pots and pans, no boys,  
have to be in by midnight, classes if you want  
to go, no work, keep my room clean, somebody to  
drive me wherever I have somewhere to go, a  
doctor and nurse practitioner. And then it cuts

BIG  
Difference  
between  
state +  
federal  
prison.  
Ask anyone  
whose  
been there.  
They'll tell  
you the  
same  
thing.

1 off, so I'm not a hundred percent sure if your's  
2 is cleaner than mine. No. Something about  
3 nurse practitioner, something nurses and LPN's  
4 on round the clock, maintenance people to fix  
5 things, groundskeepers to cut the grass, plenty  
6 of games and parenthesis, cards, Monopoly,  
7 Scrabble, Yatzee, Phase 10, rummy, Pictionary  
8 and lots more, even dominoes to play and books  
9 to read, lots of nice ladies to talk to,  
10 somebody to watch over me when I sleep,  
11 psychologists or psychiatrists or clinicians to  
12 tell about my problems. They call me mommom and  
13 when a lady slapped my face I was afraid she was  
14 going to be seriously hurt by the other lady in  
15 my building.

16 Q. Okay. And I'm going to ask you  
17 now to skip a couple pages to 3634. Do you have  
18 that?

19 A. Yes.

20 Q. And we're going to pick up with  
21 22?

22 A. 22, you said that whoever examined  
23 Christine found no evidence of multiple  
24 personality disorder. Maybe we need to find out

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from David what she told him slash what he saw  
were her problems and questions before she  
married him, the reasons he called off the \*\*\*  
wedding. I think he said he stood to lose  
\$10,000 dash wedding planner, comma, et cetera,  
at that time. In the first place, this is what  
I experienced. A, Chrissie, the child, a  
frantic baby-sitter, a perpetulant girl when  
disagreed with when told no. B Chris I, Katy's  
mom, a person who does things because society  
says. Being a mom doesn't make her happy. A  
person looking for or asking for advice that she  
uses for a short time and then drops and  
especially if good results are not met. C,  
Chris II, poisoned me, abused Leigh and Karen,  
molested Laura. D, Christine I, eager for  
battle, shines when she's getting ready and goes  
to court ready for the challenge, in  
parenthesis, in business too. E, Christine II,  
the victim molested by father, high school  
friends, David and I made up terrible lies about  
her, not financially cared for by Bill,  
controlled by David, counseled by, rejected  
ultimately by Scott. If she doesn't have

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1 multiple personality disorder or some other  
2 mental illness, does it mean that she's just  
3 your everyday average garden variety child  
4 abuser, child molester, abuser of the elderly,  
5 black widow, money grabbing pervert. Should we  
6 warn Mr. Purcell? How do we get her, my son,  
7 her and children and Mr. Purcell help? Signed  
8 Lenore Matusiewicz.

9 Q. And then there's P.S.?

10 A. P.S., I still feel kind of sorry  
11 for her. I think she's looking for love and  
12 doesn't recognize it when she has it. When  
13 Leigh tried to give her some, she pushed Leigh  
14 away, LM.

15 Q. Okay. And what follows is --  
16 that's the end of the letter?

17 A. Yes.

18 Q. What follows is another letter to  
19 Doctor Orlov?

20 A. Yes.

21 Q. Dated 9-12-10?

22 A. Yes.

23 Q. All right. And that one, if  
24 you'll go through three pages, bears the name

1 Lenore Matusiewicz?

2 A. Yes.

3 Q. All right.

4 A. It is at the bottom FD dash

5 003639.

6 Q. Okay.

7 A. And it says sincerely Lenore  
8 Matusiewicz in print and it's signed Lenore  
9 Matusiewicz.

10 Q. Okay. And the very next page  
11 appears to be another letter?

12 A. Yes.

13 Q. This one addressed to dear Mr.

14 Roberts?

15 A. Yes.

16 Q. And could we just read the first  
17 paragraph of that?

18 A. I've just gotten another piece to  
19 our puzzle from Ms. Ann Weiss, counselor for  
20 Unit 6 at Baylor. She said that people who have  
21 dissociative identity disorder, in parenthesis,  
22 multiple personality disorder, end parenthesis,  
23 have what are known as, in quote, black outs.  
24 They don't lose consciousness and pass out.

1 Chirs had two episodes, question mark, and  
2 possibly three that I know about.

3 Q. All right. Moving onto the next  
4 document in this clump of documents, it's a  
5 letter. That letter that you just read, this is  
6 the last page of it, right, it's signed?

7 A. Yes, it said sincerely and it's  
8 signed Lenore Matusiewicz and in print it says  
9 Lenore Matusiewicz.

10 Q. And there's a CC, do you see that?

11 A. Dimitria Duerte.

12 Q. Do you recognize that name?

13 A. I believe that was Lenore's  
14 attorney in the criminal proceeding against her.

15 Q. Okay. And following that there's  
16 another letter, this one addressed to Tom; is  
17 that right?

18 A. This one is addressed to Tom, yes.

19 Q. All right. And at the very top of  
20 the letter it says something in handwriting.  
21 First of all, it's dated what?

22 A. 3-31-10.

23 Q. Okay. And this says handwriting  
24 here, copied it looks like?

4974  
1 A. Copied dash O-R-I-G, given to  
Bocanegra. I'm not sure what the last word is.

2 Q. Okay.

3 A. But that's 4-5-2010.

4 Q. Okay. Beyond this document is  
5 another document that I'm not going to put up on  
6 the screen, but I'm just going to ask you to  
7 describe and it's actually a series of pages  
8 that begins on FD 4010. Do you see that?

9 A. Yes.

10 Q. And it goes through FD 4060,  
11 right?

12 A. Yes.

13 Q. And prior to coming to court and  
14 any point prior, have you ever read this before?

15 A. Yes. It was part of what was sent  
16 to me, so in investigating the case I read  
17 everything that was sent to me.

18 Q. All right. And how would you  
19 describe what this is?

20 A. My understanding from the letter  
21 and from looking at it is that it is a diary  
22 that was kept by Christine Belford.

23 Q. All right. And does it bear any  
24

1 dates that would tell you the time frame of the  
2 diary?

3 A. Yes.

4 Q. You can feel free to look through  
5 it to look for that information?

6 A. I can't really see a date on the  
7 first page. There's --

8 Q. I don't need you to check every  
9 page.

10 A. Yeah, but I mean, one of the pages  
11 says March 12th, 1986.

12 Q. Now, how old was Christine Belford  
13 when she died?

14 A. I believe she was in her 30's, mid  
15 30's.

16 Q. Okay. Do you have an idea of how  
17 old she would have been in 1986, around?

18 A. I believe in 1991 she was 18,  
19 so --

20 Q. Is that based on information you  
21 gathered in the case?

22 A. Yes.

23 Q. All right.

24 A. It's based on information --

1 Q. So 1986, about 13 years old?

2 A. Yes. She was a teenager when I

3 think most of these were written that I saw.

4 Q. How old is Laura Matusiewicz now?

5 A. Laura? She was born in 2002, so  
6 she would be 13.

7 Q. All right. So you said 1986. Are  
8 there any other dates in here?

9 A. Yes. So there's 1987.

10 Q. And I'm not -- 1987, correct?

11 A. Right. There's '88.

12 Q. All right. It appears to be from  
13 that time frame; is that fair enough?

14 A. Yeah, I think it goes up to 1991.

15 Q. Without delving into the details  
16 of what you're seeing on these pages, what types  
17 of subjects is Christine discussing in the  
18 diary?

19 A. Sort of as a girl, I think some of  
20 these are teenage girl writings that you write  
21 in your diaries about your friends and who you  
22 like and who you're fighting with and who you  
23 don't like.

24 Q. Anything about boys?

1 A. Yeah, there's stuff about boys in  
2 here.

3 Q. Okay.

4 A. And girls, friends, everybody.

5 Q. All right. But there's romantic  
6 stuff in here as well, correct?

7 A. Yes.

8 Q. Very personal stuff?

9 A. Yes.

10 Q. Now, the writing, does it  
11 appear -- are there different styles in the  
12 writing; does it appear that it's written in  
13 different ways on different days?

14 A. Yes.

15 Q. Okay. And I'm looking for an  
16 example of where she actually writes her name.  
17 I think if you look at the very last page, FD  
18 4060, do you see that?

19 A. I'm trying to get there.

20 Q. 4060. It's the last page of the  
21 diary?

22 A. Yes. Yes. She does -- well, sort  
23 of.

24 Q. And she writes her name as what?

1 A. Chris Belford.

2 Q. Chris. Okay. Bear with me for  
3 one moment. And if you go back to page FD 4017,  
4 that's back toward the beginning of the diary?

5 A. Yes.

6 Q. Let me know when you get to that  
7 page.

8 A. I'm right there.

9 Q. And how does she sign her name  
10 there after the end?

11 A. Chrissy.

12 Q. Chrissy?

13 A. Yes.

14 Q. All right. You can set the diary  
15 aside. And beyond the diary in the packet of  
16 information that was sent to you, were the names  
17 and addresses of various individuals, correct?

18 A. Yes. I mean, there's -- there's  
19 other -- there's parts that I got that aren't in  
20 here, but the next thing in this packet is --

21 Q. I think you said previously that  
22 not all of these -- not every page is  
23 necessarily in this packet?

24 A. Right.



1 Q. We've weeded through it?

2 A. Right.

3 Q. But there's a page called contacts  
4 for K. Lawson?

5 A. Yes.

6 Q. That's a list of names of  
7 individuals that were provided to you by, by  
8 Lenore Matusiewicz in this package, correct?

9 A. Yes.

10 Q. All right. And similar to the  
11 list of names you got from Christine Belford?

12 A. Correct.

13 Q. All right. And --

14 A. And Tom and David Matusiewicz also  
15 emailed a list of people.

16 Q. Were you able to follow up with  
17 any of these people or did you attempt to?

18 A. I did follow up with Mike  
19 O'Rourke. I issued a subpoena to him to provide  
20 all of his records to me, which he responded to  
the subpoena and also appeared in court subject  
to his subpoena.

21 Q. Okay. The last page of this  
22 document, I believe, is this page. Do you see  
24

IS  
that the  
only  
person  
that  
ms Lawson  
contacted  
on David's  
behalf?

This is the contract that I signed with AAAAA Investigations when Christine signed the false PFA on David in 2000 & ran with the children. I hired them to locate Christine & my nieces.

1 that, it says contract at the top?

2 A. Yes.

3 Q. Are you able to make out the  
4 writing at all?

5 A. Yeah, a little bit on the hard  
6 copy.

7 Q. And what can you make out?

8 A. It says this contract dated 1 dash

2 dash 06 is made between Amy, I think it's B.  
Matusiewicz. I don't know if it's 9 or 415  
Reese Drive.

Q. You don't need to read the whole  
address. Looks like a handwritten name there a  
well.

A. Yes. And it says Amy Matusiewicz.

Q. All right. And then at the  
bottom?

17  
18 A. The signature looks like it says  
19 Amy Matusiewicz.

20 Q. All right. And at the top it's -  
21 the name on the top of the contract is this,  
22 correct?

23 A. Five A's Ace's Investigation.

24 Q. Okay. And that was the last --

1 that's the last page that you have in Exhibit  
2 507 at least, correct?

3 A. Yes.

4 Q. All right. Now, we have just gone  
5 through a very good number of pages of documents  
6 and I believe you told me before that you read  
7 everything; is that right?

8 A. I did.

9 Q. What was your reaction, your  
10 initial reaction?

11 A. I mean, my initial reaction was  
12 that there were very serious allegations in here  
13 against Christine and there are -- there also  
14 was a lot of information in here that, when I  
15 looked at prior things that I had received, I  
16 also went to the family court, pulled all family  
17 courts related to the children, which I'm  
18 authorized to do and I read every family court  
document and every case that was pending  
relating to these girls and some of the  
information. I mean, it was inconsistent with  
either other court documents or other documents,  
but they were very serious accusations. They  
seemed to be extremely, you know -- I was a

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It was  
inconsistent  
because  
the abuse  
wasn't  
reported to  
authorities  
prior to the  
kidnapping

1 little shocked by what was in them, because if  
2 true, it's pretty serious. You know, that  
3 someone is abusing their children in this way  
4 and someone is sexually molesting a child.

5 Q. What about the fact that Lenore  
6 Matusiewicz had sent you this package that  
7 included the diary of Christine Belford from  
8 when she was a teenager?

9 A. Not so much the diary itself, I  
10 mean, you know, I think diaries are something  
11 that other people don't read and everybody sort  
12 of knows the rule that you don't read other  
13 peoples' diaries. And so that was a little  
14 weird to me that she had the diary there, but  
15 when you look through it and you look at the  
16 time frame, you know, it's a teenager, it's  
17 somebody from, you know, 13 to 18 writing about  
18 their daily life. It's not -- I know it's parts  
19 of it, so I don't know what the whole thing  
20 looks like, every day or every other day, but  
21 the context in which it was placed in the  
22 letters as being evidence of multiple  
23 personality disorder or what is now known as  
24 dissociative identity disorder or people lie

1 about her or things, you know, I thought were  
2 really a different context than they were taken  
3 and put into a context that they didn't fit in  
4 or were used to -- may take a position that they  
5 were never meant for or intended to. Sort of  
6 like looking back and finding things that fit a  
7 story or that fit a context.

8 Q. Did you ever learn how Lenore  
9 Matusiewicz came into possession of Christine  
10 Belford's teenage diary?

11 A. My understanding from everything I  
12 sort of gathered was that when they separated  
13 there was some back and forth, but ultimately  
14 David was in the marital home and Lenore and Tom  
15 moved back into the marital home and Christine  
16 did take some of her possessions, but not  
17 everything, so I believe that this was left in  
18 the house and they found it in the house.

19 Q. Okay. Okay. So you get the  
20 packets of information?

21 A. Uh-huh.

22 Q. This is now into I think the date  
23 on this one was late October, correct, October  
24 27th?

*Not as  
the  
government  
says we  
stole  
Chr's  
diary...  
BIG  
DIFFERENCE*

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A. Yes.

Q. What are your next steps as you're preparing for the TPR proceeding to begin, the hearing?

A. Sometime either before this letter, around this letter, you know, I've corresponded with the girls' schools, I have had conferences with their teachers and talked about how the girls were doing in school, how they were doing when they came back in 2009, how they were doing now, similar questions, did they see any social issues, were they absent a lot, did they see any evidence that the girls are being harmed or maltreated or, you know, sad or, you know, what was their impression of the girls. I also called and got records and talked to people at the Brennan School where Leigh went, similar questions, how was she doing, what was her behavior, how was she when she came back versus now. I also called and spoke to Detective Shriner who was one of the detectives that investigated when the girls were missing and I gained some information from him. I was able to view a videotape of an interview of Laura by the

1 child advocacy center of Delaware when she was  
2 returned to Delaware. I'm trying to think of  
3 all the other things I might have done.

4 Q. Just the ones that you recall.

5 A. Yeah. I mean those are -- I know  
6 I subpoenaed another detective agency. It's not  
7 this one, but another one that I had learned had  
8 followed the school bus of Leigh one day and the  
9 police, you know, sort of interviewed him and  
10 there was a report and so I subpoenaed his  
11 records. I also went to the courthouse and  
12 pulled criminal records and went online to the  
13 extent they are public and tried to pull  
14 criminal records on the various parties in the  
15 case. That might be all of it. I'm just trying  
16 to remember, but that's the main --

17 Q. I'm not asking for an exhaustive  
18 list?

19 A. And I also talked to Doctor Orlov  
20 probably close to this point or pretty soon,  
21 because our first trial date was November 10th,  
22 so by then I had talked to her.

23 Q. And I want to direct your  
24 attention to that now because you just used a